

Exhibit F

Giovanni Seminerio

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Knight, et al. v. The Islamic Republic of Iran</i>	18-cv-12398 (GBD)(SN) ECF Case

DECLARATION OF GIOVANNI SEMINERIO

I, Giovanni Seminerio, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
2. I was a citizen of the United States on September 11, 2001, and I remain so today.
3. On September 11, 2001, I was present in New York City when the terrorist attacks on the World Trade Center (WTC) occurred.
4. On the morning of September 11, 2001, I was employed by New York City Emergency Medical Services (EMS) operating from St. Caire's Hospital in Manhattan. I was on duty when we received a call that a plane had hit one of the World Trade Center towers. At approximately 9:00 a.m. we were notified that a second plane had struck the other WTC tower. We responded to the scene.
5. Initially, we were sent to a staging area four or five blocks from Ground Zero. From the staging area, we were sent to the site in groups to provide first aid and other medical treatment to survivors. When we arrived at the scene it was very chaotic. We witnessed people running in all direction to escape, as well as people jumping from the burning towers in desperation.

6. We were approximately one block from the WTC when the first tower collapsed. The entire area was covered with smoke, fire, dust, and debris. Debris sprayed everywhere. There was at least a foot of ash and dust covering everything. We were there when the second tower dropped. Emergency vehicles, which had been lined up on West Side Highway for as far as you could see, were arriving.

7. In the aftermath of the collapses, the site appeared post-apocalyptic. All that could be seen were the bottoms of buildings with twisted steel and debris covering the site. The site was also littered with the partial remains of those who had been killed. The smell was a mixture burning chemicals and burning flesh. It was a very distinct smell that stayed with us after we left the sight. It can never be forgotten.

8. We remained at Ground Zero, treating people and putting them into ambulances for thirty-six hours. At that time, we were informed that the effort was entering the recovery stage. We returned to the hospital and took shifts, returning to the site every eight to ten hours.

9. Although we were on site from the beginning of the rescue and recovery effort, working in the midst of a noxious mix of chemicals, smoke, and ash, we had no protective equipment other than paper masks. The masks did not sufficiently filter the air. My eyes, nose, and throat burned from the beginning of the day through the end of the next day. Breathing was increasingly difficult the longer we stayed on site.

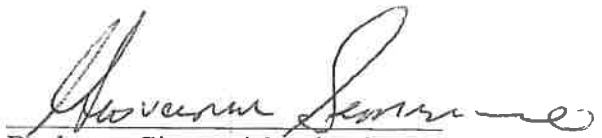
10. As a result of my exposure to the chemicals, fumes, gases, and dust on September 11 and the following weeks, I have continued to suffer from a number of medical issues. I sought medical treatment after 9/11 and am still being treated for periodic difficulty breathing, problems with my nose and throat, as well as chronic cough, chest pain, and stomach pain.

11. My physical injuries and conditions have been confirmed through the World Trade Center Health Program (WTCHP) and determined to be eligible for compensation by the Victim Compensation Fund (VCF).

12. I continue to seek medical treatment for the injuries I suffered on 9/11 and its immediate aftermath. Following the evaluation of my conditions by the WTCHP, I pursued a claim with the VCF and was found eligible for compensation for chronic rhinitis and esophageal reflux. A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 is submitted with this Declaration as part of this exhibit.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 24th day of March, 2025.


Declarant Giovanni Seminerio



September 11th
Victim Compensation Fund

September 23, 2014

GIOVANNI SEMINERIO



Dear Giovanni Seminerio:

Your Eligibility Form for the September 11th Victim Compensation Fund (VCF) has been reviewed. You submitted an Eligibility Form for Personal Injury Claimants. Your claim number is VCF0019369. The Claims Evaluator determined that your Eligibility Form was substantially complete on September 23, 2014. As stated in the Regulations and on the Eligibility Form, by filling a substantially complete Eligibility Form, you have waived your right to file or be a party to a September 11th-related lawsuit.¹ For more information about this topic, please review Frequently Asked Questions (FAQ) 7.1-7.4 on <http://www.vcf.gov/faq.html>.

The Decision on your Claim

The VCF has determined that you meet the eligibility criteria established in the statute (the Zadroga Act and the original statute) and regulations and therefore the VCF will review your Compensation Form and supporting materials to determine the amount of any award. Based on the information you submitted and information the VCF has received from the World Trade Center Health Program (WTCHP), you have been found eligible for the following injuries:

- CHRONIC RHINITIS
- ESOPHAGEAL REFLUX

Please note that there are several reasons why an injury that you think should be eligible is not listed above. First, for non-traumatic injuries, the description of the injury is based on the information provided by the WTCHP and there can be several alternative descriptions for the same injury. Additionally, a WTCHP physician may have provided testing or treatment for an injury even if the WTCHP has not certified that injury for treatment. Finally, your injury may not be listed if it was only recently certified for treatment by the WTCHP. The VCF regularly receives updated information from the WTCHP and will notify you if additional injuries have become eligible.

What Happens Next

¹ The Statute (the Air Transportation Safety and System Stabilization Act as amended by the Zadroga Act) and the Regulations are located at <http://www.vcf.gov/lawRulesOtherDocs.html>.



September 11th
Victim Compensation Fund

The VCF will determine your compensation award based solely on the eligible injuries listed above. In order for the VCF to do so, you must submit the Compensation Form for Personal Injury Claimants and the required supporting documents. If you have not already done so, please submit the Compensation Form and the required supporting documents as soon as possible. You are encouraged to submit the Compensation Form through the VCF's web-based claim system at www.vcf.gov. If you wish to complete the Compensation Form in hardcopy, you may request the form by contacting the toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-353-0356.

In addition to the Compensation Form, please also complete and submit the VCF ACH Payment Information Form. This form can be found on our website in Section 8 of the Frequently Asked Questions (FAQs). The completed form must be submitted before the VCF can arrange for any payment.

The VCF will be able to determine your compensation award based on the eligible conditions after all compensation related documents are submitted. When you receive an award letter, you will have the right to appeal. In that appeal, you have the right to assert additional injuries that you believe are eligible and for which you believe you should be compensated. For purposes of the statutory deadlines, the injuries listed in your claim form and the injuries certified as eligible will be deemed "filed". You will receive instructions on the appeal process when you receive the letter with details of your compensation award.

If you have questions about the information in this letter or the claims process in general, please contact our toll-free Helpline at the number noted above. Every effort will be made to respond to your inquiries as soon as possible.

Sincerely,

September 11th Victim Compensation Fund